

REMARKS

Claims 1-37 are pending in the application and stand rejected. By the above amendment, claims 1, 3, 12, 13, 19 and 29 have been amended. Applicant requests reconsideration of the claim rejections based on the above amendments and following remarks.

Claims 1-15 and 19-37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,119,147 to Hashimoto for the reasons set forth on pages 2-9 of the Office Action. Further, claims 16-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hashimoto in view of U.S. Patent No. 6,119, 147 to Toomey. It is respectfully submitted that all pending claims are patentable over the cited art of record.

More specifically, Applicant respectfully submits that at the very minimum, claims 1, 19 and 29 are patentable and non-obvious over Hashimoto. For instance, Hashimoto does not disclose or suggest a system or method for synchronizing multi-modal interactions; comprising, *inter alia*, a multi-modal application comprising at least a first mode process that enables user interaction with the application in a first modality and a second mode process that enables user interaction with the application in a second modality, as commonly recited in claims 1, 19 and 29.

On page 2 of the Office Action, Examiner cites FIG. 56 of Hashimoto as disclosing a multi-modal application (1A) comprising at least a first mode process and a second mode process. Applicant respectfully disagrees with such characterization. Indeed, in FIG. 56, Hashimoto discloses a speech I/O system (1A) that provides a speech-enabled interface for each of a plurality of separate application programs (2). In the first instance, it is respectfully submitted that Examiner's characterization of the speech I/O system (1A) being a multi-modal

application is incorrect because the system (1A) provides only one interaction modality, i.e., speech I/O. Indeed, the speech interface (1A) does not enable a user interaction in any other modality other than speech. In this regard, the speech interface (1A) clearly is not a multi-modal application *comprising at least a first mode process that enables user interaction with the application in a first modality and a second mode process that enables user interaction with the application in a second modality*, as recited in claims 1, 19 and 29.

Further, there is nothing in Hashimoto that discloses or suggests that the application programs (2) are multi-modal applications comprising a first and second mode process, or that each application (2) comprises a different mode process for the same application.

In addition, Hashimoto does not disclose or suggest in FIG. 56 *a multi-modal shell for managing and synchronizing information exchanges between the first and second mode processes of the multi-modal application to enable a synchronized multi-modal interaction with the application*, as recited in claim 1. In the first instance, Examiner's characterization of the speech unit (12 or 14) as being a "first mode process" of a multi-modal application and the application (20) being a "second mode process" of the multi-modal application is incorrect. The speech units (12) and (14) are nothing more than speech engines that provide speech recognition and speech synthesis functions, respectively. These units (12) and (14) clearly do not comprise a "mode process" of a multi-modal application as is readily understood by those of ordinary skill in the art.

Furthermore, with respect to claims 19 and 29, it is respectfully submitted that Hashimoto does not disclose or suggest *receiving a command or event in the first modality; triggering (i) an action in the first modality and (ii) a corresponding action in the second modality, based on the received command or event; and updating application states or device states associated with the*

first modality and the second modality, as recited in claims 19 and 29. On page 7 of the Office Action, Examiner acknowledges that Hashimoto does not explicitly teach “updating the application state of the first modality”, but cites Col. 14, lines 37-46 contends that the speech recognition system notifies the application program (2) when there is a change in the internal state of the speech recognition interface. However, such notification is for the purpose of enabling the application programs (2) to control or otherwise setting up the speech recognition system (see, Col. 14, lines 30-35, lines 41-42). This is fundamentally different from the claimed inventions wherein the applications states (first and second mode process) associated with the first and second modality of a multi-modal application are updated so as to provide a synchronized user interface. Indeed, as noted above, the speech recognition units (12) and (14) do not comprise “a mode process” of a multi-modal application as claimed.

Accordingly, claims 1, 19 and 29 are believed to be patently distinct and patentable over Hashimoto. Furthermore, claims that depend from claims 1, 19 and 29 are patentable over Hashimoto as at least for the same reasons given for respective base claims 1, 19 and 29. Accordingly, withdrawal of the claim rejections under 35 U.S.C. 102 is respectfully requested.

Further, with respect to the rejection of claim 16-18 based on the combination of Hashimoto and Toomey, such combination is believed to be legally deficient at least to the extent that Hashimoto does not disclose or suggest the inventions of claim 1, from which claims 16-18 depend. Furthermore, Toomey is distinguishable from the claimed inventions at least for the reasons previously cited by Applicant. Therefore, withdrawal of the rejection is respectfully requested.

Based on the above, the application is believed to be in condition for allowance. Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe

that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants' undersigned attorney.

Respectfully submitted,



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